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14
15 **IN THE UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 ANDREW KALLAS,
18 Plaintiff

CASE NO.: 2:24-cv-02385-CDS-MDC
Stipulation of Dismissal with Prejudice

19 v.
20

21 WHITE HAWKS AUTO LLC, a California
22 limited liability company, TEMPUS LOGIX,
23 INC., a California corporation, NORTHLAND
24 INSURANCE COMPANY, a Connecticut
25 corporation, LUBERNER INTERNATIONAL
26 INSURANCE AGENCY, INC., and DOES 1-
27 15,

28 Defendants

29
30 IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff, Andrew
31 Kallas, and Defendants, White Hawks Auto LLC, Northland Insurance Company and Luberner
32 International Insurance Agency, Inc, that the aforementioned defendants may be dismissed with
33 prejudice, each party shall bear their own costs and fees. This stipulation is contingent upon the
34 Court granting Northland Insurance and White Hawks Auto's Motion for good faith settlement [ECF
35 36].
37
38

1 This settlement does not affect the plaintiff's Cause of Action against the remaining
2 defendant, TEMPUS LOGIX, INC, whose default was entered on February 19, 2025 [ECF 22] or
3 any defenses thereto.
4

5 DATED this 20th day of June 2025.

6

7 DATED this 20th day of June, 2025.

8 By: /s/ Bradley Paul Elley
9 Bradley Paul Elley, Esq.
10 120 Country Club Dr., Suite 5
11 Incline Village, NV 89451
12 Tel: (775) 831-8800 brad@bpelleylaw.com

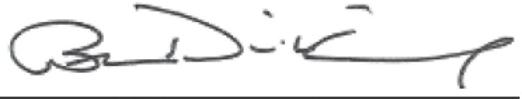
13 Attorneys for Plaintiff

14 DATED this 20th day of June 2025

15 DEFENDANT IN PRO PER

16 By: /s/ Luz Mejia
17 Luz Mejia
18 Luberner International Ins. Agency Inc.
19 13303 S. Inglewood Ave.
20 Hawthorne, CA 90250
21 Ph: 424-456-7354 / Fax: 424-456-4907
22 lmejia@lubemerinsurance.com

23 THORNDAL ARMSTRONG, PC

24 By: 
25 Bruce Scott Dickinson, Esq. (NSB 002297)
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29 Attorneys for White Hawks Auto LLC.

30 DATED this 20th day of June 2025.

31 MCKICKLE, KUREY & BRANCH, LLP

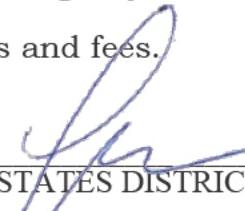
32 By: /s/ Tania J. Moore

33 Tania J. Moore, Esq.
34 217 Rosewell St., Suite 200
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36 Tel: (678) 824-7840
37 tmoore@mkblawfirm.com
38 -and-

39 Timothy F. Hunter, Esq.
40 RAY LEGO & ASSOCIATES

41 Attorneys for Northland Insurance
42 Company

43 Based on the parties' stipulation, White Hawks Auto LLC, Northland
44 Insurance Company, and Luberner International Ins. Agency Inc. are dismissed
45 with prejudice, with each party to bear its own costs and fees.

46 
47 UNITED STATES DISTRICT JUDGE

48 Dated: June 24, 2025